

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. No. \_\_

**ORDER SUSTAINING FTX RECOVERY TRUST'S ONE HUNDRED NINETY-SIXTH  
(NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN  
LATE FILED PROOFS OF CLAIMS (CUSTOMER CLAIMS)**

Upon the one hundred ninety-sixth omnibus objection (the “Objection”)<sup>2</sup> of the FTX Recovery Trust<sup>3</sup>, for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Late Filed Claims set forth in Schedule 1 attached hereto; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

<sup>3</sup> The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ (as defined below) confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates* [D.I. 26404-1].

provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the FTX Recovery Trust; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Late Filed Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety.
3. The clerk of the Court and the claims and noticing agent appointed in the above captioned bankruptcy case are directed to reflect the disallowance of the Late Filed Claims set forth in Schedule 1 attached hereto in their respective records.
4. Should one or more of the grounds of objection stated in the Objection be dismissed, the FTX Recovery Trust's right to object on any other grounds that the FTX Recovery Trust discovers is preserved.
5. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Late Filed Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.
6. Each of the Late Claims and the objections by the FTX Recovery Trust to

such claims, as set forth on Schedule 1 hereto, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate Order with respect to each such Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

7. The FTX Recovery Trust is authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

8. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the FTX Recovery Trust may have to enforce rights of setoff against the claimants.

9. Nothing in the Objection or this Order, nor any actions or payments made by the FTX Recovery Trust pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors or the FTX Recovery Trust under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the FTX Recovery Trust's or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the FTX Recovery Trust; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

10. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

11. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: \_\_\_\_\_  
Wilmington, Delaware

\_\_\_\_\_  
The Honorable Karen B. Owens  
Chief United States Bankruptcy Judge

**SCHEDULE 1**

**Late Filed Claims**

**FTX Trading Ltd. 22-11068 (KBO)**  
**One Hundred Ninety-Sixth Omnibus Claims Objection**  
**Schedule 1 - Late Filed Claims**

**Asserted Claims**

Claim Number	Name	Debtor	Date Filed	Tickers	Ticker Quantity
100369	Name on file	FTX Trading Ltd.	7/2/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100365	Name on file	FTX Trading Ltd.	7/2/2025	USD	95.00000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100374	Name on file	FTX Trading Ltd.	7/3/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100352	Name on file	West Realm Shires Services Inc.	6/25/2025	ETH FTT MOD USDC	1,267.54000000000000 0.230000000000000 198,000.00000000000000 64.270000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100370	Name on file	FTX Trading Ltd.	7/3/2025	BTC ETH TRX UNI USDC USDT	0.000000001090082 0.000000002067566 0.000000004137820 0.00000000411426 0.000000772849740 0.000000004137820
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
98425	Name on file	FTX Trading Ltd.	12/5/2024		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date. As a result, the claim should be disallowed in its entirety.					
100384	Name on file	FTX Trading Ltd.	7/10/2025	USD	2,000.00000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100334	Name on file	FTX Trading Ltd.	6/10/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100351	Name on file	FTX Trading Ltd.	6/24/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100394	Name on file	FTX Trading Ltd.	7/14/2025	BTC	0.142000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100364	Name on file	FTX Trading Ltd.	7/2/2025	SHIB	2,000.00000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100361	Name on file	FTX Trading Ltd.	6/30/2025	AAVE AUD AVAX BCH BTC CAD DOGE ETH EUR GBP GRT LINK LTC SOL TRX UNI USD XRP	3.000000000000000 500.00000000000000 10.000000000000000 5.000000000000000 0.200000000000000 500.00000000000000 1,000.00000000000000 2.000000000000000 500.00000000000000 500.00000000000000 50.000000000000000 50.000000000000000 15.000000000000000 100.000000000000000 100.000000000000000 50.000000000000000 100.000000000000000 100.000000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100348	Name on file	FTX Trading Ltd.	6/21/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100367	Name on file	FTX Trading Ltd.	7/2/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100406	Name on file	FTX Trading Ltd.	7/8/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100371	Name on file	FTX Trading Ltd.	7/3/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100368	Name on file	FTX Trading Ltd.	7/2/2025		Undetermined*
Other Activity Asserted: 19 - Shiba inu					
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100358	Name on file	FTX Trading Ltd.	6/29/2025	BTC	0.100000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100347	Name on file	FTX Trading Ltd.	6/20/2025		Undetermined*

## Asserted Claims

Claim Number	Name	Debtor	Date Filed	Tickers	Ticker Quantity
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100395	Name on file	FTX Trading Ltd.	7/14/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100359	Name on file	FTX Trading Ltd.	6/30/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100303	Name on file	FTX Trading Ltd.	6/2/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100356	Name on file	FTX Trading Ltd.	6/28/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100357	Name on file	West Realm Shires Services Inc.	6/28/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100355	Name on file	FTX Trading Ltd.	6/28/2025	USD	80.00000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100389	Name on file	FTX Trading Ltd.	7/13/2025	USD	5,000.00000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100349	Name on file	FTX Trading Ltd.	6/21/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100398	Name on file	FTX Trading Ltd.	7/16/2025	ETH ETHW TRX USD	4.100000000000000 4.100000000000000 845.0000000000000 176.79764710500000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100392	Name on file	FTX Trading Ltd.	7/14/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100346	Name on file	West Realm Shires Services Inc.	6/19/2025	AAVE BAT BTC DOGE ETH ETHW MATIC	0.259630250000000 109.39294406000000 0.036911090000000 111.43037528000000 1.594091720000000 1.593422210000000 163.36897672000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100382	Name on file	FTX Trading Ltd.	7/10/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100379	Name on file	FTX Trading Ltd.	7/9/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100393	Name on file	FTX Trading Ltd.	7/14/2025	POC Other NFT Assertions: COACHELLA IN BLOOM	1.000000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100350	Name on file	FTX Trading Ltd.	6/24/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100373	Name on file	FTX Trading Ltd.	7/3/2025	AUD BTC CRO DOGE ETH LINK MANA SOL XRP	5,000.0000000000000 0.500000000000000 500.0000000000000 500.0000000000000 12.00000000000000 2,000.0000000000000 200.0000000000000 35.00000000000000 250.0000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100366	Name on file	FTX Trading Ltd.	7/2/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100378	Name on file	FTX Trading Ltd.	7/7/2025	ETH USD	0.300000000000000 150.0000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100401	Name on file	FTX Trading Ltd.	7/8/2025	USD	20,000.0000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100380	Name on file	FTX Trading Ltd.	7/8/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100396	Name on file	FTX Trading Ltd.	7/15/2025	EUR	100,000.0000000000000

Undetermined\* indicates claim contains unliquidated and/or undetermined amounts



## Asserted Claims

Claim Number	Name	Debtor	Date Filed	Tickers	Ticker Quantity
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100397	Name on file	FTX Trading Ltd.	7/15/2025		Undetermined*
Other Activity Asserted: 3848.9090 USD - Accidentally transfer money to FTX after bankrupt refer TXID: #####					
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100354	Name on file	West Realm Shires Services Inc.	6/27/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100372	Name on file	West Realm Shires Services Inc.	7/3/2025	BRL CUSDT	1.00000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100362	Name on file	FTX Trading Ltd.	6/30/2025	USD	3,400.00000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100290	Name on file	FTX Trading Ltd.	5/27/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100402	Name on file	FTX Trading Ltd.	7/17/2025	BRZ BTC DOGE ETH SOL	1.00000000000000 0.0151029000000000 2.0000000000000000 0.1394805200000000 4.5637538100000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100385*	Name on file	FTX Trading Ltd.	7/5/2025	USD	650.00000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100375	Name on file	FTX Trading Ltd.	7/5/2025	ATOM BCH BNB BTC BULL CRO DOGE DOGEBULL ETH FTT LTC SHIB STEP USDC USTC	25.00000000000000 125.00000000000000 125.00000000000000 125.00000000000000 10.00000000000000 75.00000000000000 200.00000000000000 50.00000000000000 25.00000000000000 200.00000000000000 25.00000000000000 125.00000000000000 25.00000000000000 100.00000000000000 25.00000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100304	Name on file	FTX Trading Ltd.	6/2/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100399	Name on file	Quoine Pte Ltd	7/16/2025	BCH BTC BTCV ETH MKR USD XRP	2.0779862800000000 0.0426261200000000 0.0000136300000000 0.3032237800000000 0.0280000000000000 49.9456400000000000 202.3993327200000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100403	Name on file	FTX Trading Ltd.	7/17/2025	POC Other Fiat Assertions: INDIAN RUPEE (INR) RATE 82.60 ×3621= 2,99,095	3,621.00000000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100363	Name on file	FTX Trading Ltd.	7/1/2025	BNB ETH ETHW FTT MATIC RUNE SAND SOL USDT	12.9956461100000000 1.4094334800000000 1.4026764000000000 16.4967000000000000 442.2421342700000000 0.0582575500000000 160.9687660000000000 11.6640960500000000 53.1900648800000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100388	Name on file	West Realm Shires Services Inc.	7/13/2025	BTC DOGE ETH ETHW LINK SHIB TRX USD	0.5037394200000000 3.0000000000000000 2.3930365800000000 0.8427462700000000 74.7617050600000000 2.0000000000000000 1.0000000000000000 759.127674569216170
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100387	Name on file	FTX Trading Ltd.	7/11/2025	FTT LUNA2 SOL	0.0000000100000000 4.7554223100000000 0.0000000100000000

## Asserted Claims

Claim Number	Name	Debtor	Date Filed	Tickers	Ticker Quantity
				SRM	0.916849150000000
				USD	6,380.880000000000000
				USDT	20.000000000000000
				XRP	15,747.670054510000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100386	Name on file	FTX Trading Ltd.	7/11/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100377	Name on file	FTX Trading Ltd.	7/6/2025		Undetermined*
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					
100353	Name on file	FTX Trading Ltd.	6/25/2025	USDC	11,328.189970000000000
Reason: The claim was filed after the applicable FTX customer claim bar date and the Effective Date of the confirmed Plan. As a result, the claim should be disallowed in its entirety.					